INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

March 31, 2004

TO: Interested Parties / Applicant

RE: TE Products Pipeline Company / 063-18408-00035

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FN-REGIS.dot 8/11/03

March 31, 2004

Kristine Aparicio
TE Products Pipeline Company, L.P.
P. O. Box 2521
Houston, Texas 77252

Re: Registered Construction and Operation Status,
063-18408-00035

Dear Ms. Aparicio:

The application from TEPPCO Indianapolis Terminal received on January 20, 2004 has been reviewed. Based on the data submitted and the provisions 326 IAC 2-5.5, it has been determined that the following petroleum products storage terminal, located at 10731 East County Road 300 North, Indianapolis, IN 46234, remains to be a registered source:

Proposed Emission Units and Pollution Control Equipment

(a) Installation of one (1) vertical internal floating roof storage tank, identified as Tank No. 5106, to store natural gasoline, gasoline, diesel, jet kerosene and other petroleum products, with a maximum capacity of 5,250,000 gallons.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Installation of dome roofs to existing three (3) external floating roof tanks (ID NOs. 5101, 5103 and 5105), each storing natural gasoline, gasoline, Jet A Kerosene, Diesel and similar low VP product, each with a maximum capacity of 2,814,000 gallons, and each exhausting at one (1) emission point identified as 01, 03 and 05, respectively (each originally constructed in 1957). Note: A domed external floating roof is equivalent to an internal floating roof.

(b) Two (2) vertical fixed roof cone tanks (ID NOs. 5102 and 5104), each currently permitted to store Jet A Kerosene, Diesel and similar low vapor pressure (VP) product, each with a maximum capacity of 2,843,568 gallons, and each exhausting at one (1) emission point identified as 02 and 04, respectively (each originally constructed in 1957).

An internal floating roof will be installed to Tank ID No. 5104. After the installation of an internal floating roof, this tank will be permitted to store natural gasoline and gasoline in addition to the other products listed above.

(c) Two (2) internal floating roof tanks (ID NOs. 5161 and 5162), storing transmix, gasoline, Jet A Kerosene, Diesel and similar low VP product, each with a maximum capacity of 84,000 gallons, and each exhausting at one (1) emission point identified as 06 and 07, respectively (each originally constructed in 1957).

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(f) Purge double block and bleed valves.

(g) One (1) propane or butane fired flare used during emergency and non-routine maintenance activities with negligible emissions.

(h) Two (2) 1,977 bbl (83,034 gallon) fixed roof storage tanks for storing water that accumulates in the petroleum storage tanks.

The following conditions shall be applicable:

(1) Internal Floating Roof [326 IAC 12 and 40 CFR Part 60, Subpart Kb]

Pursuant to 326 IAC 12 and 40 CFR Part 60, Subpart Kb, Tank 5104 internal floating roof shall meet the following specifications:

(a) The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

(i) The internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(A) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal).

(B) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(C) A mechanical shoe seal.

(ii) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

(iii) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

(iv) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(v) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

(vi) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

(vii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

(viii) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

(2) Testing Methods and Procedures [326 IAC 12 and 40 CFR Part 60, Subpart Kb]

Pursuant to Part 60.113b Testing and Procedures, the owner or operator of Tank 5104 shall:

(a) Visually inspect the internal floating roof, double-seal system - the primary seal, the secondary, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this NSPS.

(b) Notify the Administrator in writing at least 30 days prior to the filling or refilling of the storage vessel to afford the Administrator the opportunity to have an observer present. If the inspection required is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.

(3) Reporting and Record Keeping Requirements [326 IAC 12 and 40 CFR Part 60, Subpart Kb]

The owner or operator of the storage Tank 5104 shall keep copies of all reports and records required by this section for at least 2 years.

(a) Record of each inspection performed as required by §60.113b (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

(b) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made.

(c) The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (ii) of this section, for at least 2 years. The record required by paragraph (ii) of this section will be kept for the life of the source.

(i) The owner or operator of the storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

(ii) The owner or operator of the storage vessel with a design capacity greater than or equal to 151 m3 storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

(4) Storage Vessel, ID Tank 5106 [326 IAC 12 and 40 CFR Part 60, Subpart Kb]

Storage Vessel, ID Tank 5106 is not subject to 326 IAC 12 and 40 CFR Part 60, Subpart Kb, as it will store petroleum products with VOL less than 5.2 kPa (0.75 psi). However, conditions (1),

(2) and (3) of this permit shall apply to this tank upon storing petroleum products with vapor pressure equal to or greater than 5.2 kPa (0.75 psi) but less than 76.6 kPa (11.3 psi).

(5) Petroleum Liquid Storage Facilities [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3;

(a) The internal floating roof from Tanks 5101, 5103, 5104, 5105, 5106, 5161 and 5162 shall be equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.

(b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(c) All openings, except stub drains, are equipped with covers, lids, or seals such that:

(i) the cover, lid, or seal is in the closed position at all times except when in actual use;
(ii) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
(iii) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Additionally, pursuant to 326 IAC 8-4-3, the Permittee shall maintain records including the following:

(i) The types of volatile petroleum liquids stored.

(ii) The maximum true vapor pressure.

(iii) Records of the inspections.

This Condition no. 5 shall apply to storage tank ID No. 5102 and 5106 upon storing petroleum products with true vapor pressure of 1.52 psi or greater.

(6) Opacity Limitations [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.

This registration is a revised registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to (326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

APD

cc: File - Hendricks County
Hendricks County Health Department
Air Compliance -Jim Thorpe
Permit Tracking
Compliance Data Section

Registration
Annual Notification

This form should be used to comply with the notification requirements 326 IAC 2-5.5-4(a)(3)

Company Name:	**TEPPCO Indianapolis Terminal**
Address:	**10731 East County Road 300 North**
City:	**Indianapolis**
Authorized individual:	**Kristine Aparicio**
Phone #:	**(713) 759-2521**
Registration #:	**063-18408-00035**

I hereby certify that **TEPPCO Indianapolis Terminal** is still in operation and is in compliance with the requirements of **Registration 063-18408-00035.**

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: TEPPCO Indianapolis Terminal
Source Location: 10731 East County Road 300 North, Indianapolis, IN 46234
County: Hendricks
SIC Code: 4613
Operation Permit No.: R063-18408-00035
Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a re-Registration application from TEPPCO, a petroleum products storage terminal, relating to the installation of a new storage tank and conversion of existing external floating roof tanks and vertical fixed or cone roof tank into internal floating roof tanks. This change will trigger the applicability of the NSPS, Subpart Kb (see page 5 of this TSD).

Proposed Emission Units and Pollution Control Equipment

(a) Installation of one (1) vertical internal floating roof storage tank, identified as Tank No. 5106, to store natural gasoline, gasoline, diesel, jet kerosene and other petroleum products, with a maximum capacity of 5,250,000 gallons.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Installation of dome roofs to existing three (3) external floating roof tanks (ID NOs. 5101, 5103 and 5105), each storing natural gasoline, gasoline, Jet A Kerosene, Diesel and similar low VP product, each with a maximum capacity of 2,814,000 gallons, and each exhausting at one (1) emission point identified as 01, 03 and 05, respectively (each originally constructed in 1957). Note: A domed external floating roof is equivalent to an internal floating roof.

(b) Two (2) vertical fixed roof cone tanks (ID NOs. 5102 and 5104), each currently permitted to store Jet A Kerosene, Diesel and similar low vapor pressure (VP) product, each with a maximum capacity of 2,843,568 gallons, and each exhausting at one (1) emission point identified as 02 and 04, respectively (each originally constructed in 1957).

An internal floating roof will be installed to Tank ID No. 5104. After the installation of an internal floating roof, this tank will be permitted to store natural gasoline and gasoline in addition to the other products listed above.

(c) Two (2) internal floating roof tanks (ID NOs. 5161 and 5162), storing transmix, gasoline, Jet A Kerosene, Diesel and similar low VP product, each with a maximum capacity of 84,000 gallons, and each exhausting at one (1) emission point identified as 06 and 07, respectively (each originally constructed in 1957).

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(f) Purge double block and bleed valves.

(g) One (1) propane or butane fired flare used during emergency and non-routine maintenance activities with negligible emissions.

(h) Two (2) 1,977 bbl (83,034 gallon) fixed roof storage tanks for storing water that accumulates in the petroleum storage tanks.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP-063-00028 (B) , issued on February 22, 1995;

(b) Registration letter for Tanks 5161 and 5162, issued on December 7, 1981; and

(c) Registration R063-7788-00035, issued on April 1, 2003.

All conditions from previous approvals were incorporated into this Registration.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Tank Height (feet)	Tank Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
01	Tank 5101	48	100	4712	Ambient
02	Tank 5102	40	110	5701	Ambient
03	Tank 5103	48	100	4712	Ambient
04	Tank 5104	40	110	5701	Ambient
05	Tank 5105	48	100	4712	Ambient
06	Tank 5161	32	21.25	213	Ambient
07	Tank 5162	32	21.25	213	Ambient

Recommendation

The staff recommends to the Commissioner that the Registration be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 20, 2004, with additonal

information received on January 30, 2004; and February 11, 2004.

Emission Calculations

Storage Tanks Emissions: See Tanks 4.0 Program for detailed emissions calculations, and pages 1 through 4 TSD Appendix A for Summaries.

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO_2	0.00
VOC	14.28 *
CO	0.00
NO_x	0.00

HAP's	Potential To Emit (tons/year)
Benzene	0.17
Toluene	0.66
Ethylbenzene	0.19
Xylenes	0.44
Hexane	0.15
MTBE	0.11
TOTAL	1.72

Note: The HAPs were based on speciation in the Tanks 4.0 Program, by prorating individual HAP from the total VOC emissions.
* Includes fugitive emissions

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 10 tons per year and less than 25 tons per year. Therefore, the source will remain to be subject to the provisions of 326 IAC 2-5.1-2.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty five (25) tons per year. Therefore, the source will remain to be is subject to the provisions of 326 IAC 2-5.1-2.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the volatile organic compound (VOC) emissions are not counted toward determination of PSD.

County Attainment Status

The source is located in Hendricks County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Hendricks County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing re-permitted Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Emissions (ton/yr)
PM	0.00
PM10	0.00
SO_2	0.00
VOC	14.11*
CO	0.00
NO_x	0.00
Single HAP	0.66
Total HAPs	1.72

* This source's fugitive emissions are not counted towards PSD applicability.

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

(a) 326 IAC 2-7 (Part 70 Permit Program)
This existing re-permitted source, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(1) each criteria pollutant is less than 100 tons per year,
(2) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(3) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) 326 IAC 12 and 40 CFR Part 60, Subpart K, Ka, and Kb - Standards of Performance for Petroleum Liquid Storage Vessels

(1) Subpart K - applies to petroleum storage vessels with capacities greater than 40,000 gallons and greater than 65,000 gallons, and commences construction or modification after June 11, 1973 and prior to May 19, 1978.

(2) Subpart Ka - applies to petroleum storage vessels with capacities greater than 40,000 gallons, for which construction commenced after May 18, 1978 and prior to July 23, 1984.

(3) Subpart Kb - applies to volatile organic liquid storage vessels including petroleum liquid storage vessels with capacities greater than or equal to 151m^3 (39,890 gallons), containing VOL with maximum true vapor pressure equal to or greater than 5.2 kPa (0.75 psi) but less than 76.6 kPa (11.3 psi) or vessels with design capacities greater than or equal to 75 m^3 (19,813 gallons) but less than 151m^3 (39,890 gallons) containing VOL with maximum true vapor pressure equal to or greater than 27.6 kPa (4.0 psi) but less than 76.6 kPa (11.3 psi), for which construction, reconstruction, or modification is commenced after July 23, 1984.

(A) Vertical fixed roof, identified as Tank 5102 is not subject to Subparts K, Ka, nor Kb, as it was constructed in 1957 and has not been modified, nor it is being modified or reconstructed in this Registration 063-18408.

(B) Internal floating roof tanks, identified as Tank 5161 and Tank 5162 were originally constructed in 1957 as fixed cone roof tanks. They were converted into internal floating roofs with a primary mechanical shoe seal on October 28, 1981, under Registration 063-7788-00035. This conversion was not considered a modification because the potential to emit did not increase, and were not determined to be subject to 40 CFR Part 60, Subparts K, Ka, or Kb. These tanks will stay unchanged in this re-Registration 063-18408-00035, and the NSPS non-applicability determination will stay the same.

Note:
The change of service to an aboveground storage tank would only be considered a modification under the applicable subparts of the "Standards of Performance for New Stationary Sources" (40 CFR 60, Subparts A, K, Ka, and Kb) if that change of service:

(1) "increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted." (from definition of "Modification", 40 CFR 60.2).

(2) requires a physical change to the tank, such as the installation of new seals, or an internal floating roof.

A change of service without a physical change to the tank is not considered a modification because, as stated in 40 CFR 60.14(e):
"The following shall not, by themselves, be considered modifications under this part:
(1) Use of an alternative fuel or raw material if, prior to the date any standard under this part becomes applicable to that source type... the existing facility was designed to accommodate that alternative use."

(C) Tanks 5101, 5103, and 5105 were originally constructed in 1957 as external floating roofs. This Registration 063-18408 will allow these tanks to be converted into domed external floating roof tanks. 40 CFR Part 60, Subparts K, Ka, or Kb will not be applicable to these tanks, as the physical change does not cause to increase their PTE, hence does

not meet the definition of a modification.

(D) Vertical fixed roof, Tank 5104 with a capacity of 2,843,568 gallons was originally constructed in 1957 and currently store diesel with a vapor pressure of 0.008 psi. This re-Registration 063-18408-00035 will allow the source to do a physical change to convert Tank 5104 into an internal floating roof tank, and will store gasoline that will increase the PTE. Therefore, this change qualifies as a modification, under the Part 60.14 definition. Therefore, this tank will be subject to 40 CFR Part 60, Subpart Kb since its capacity is greater than or equal to 151m^3 (39,890 gallons), and it will be storing gasoline with a vapor pressure of 6.2 psi and other similar petroleum products containing VOL with maximum true vapor pressure equal or greater than 5.2 kPa (0.75 psi) but less than 76.6 kPa (11.3 psi). The following shall be applicable:

(1) Pursuant to 326 IAC 12 and 40 CFR Part 60, Subpart Kb, Tank 5104 internal floating roof shall meet the following specifications:

(i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

(ii) The internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(1) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal).

(2) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(3) A mechanical shoe seal.

(iii) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

(iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

(v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

(vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

(viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

(ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

(2) **Testing and Procedures**

Pursuant to Part 60.113b Testing and Procedures, the owner or operator of Tank 5104 shall meet the following requirements:

(i) After installing the internal floating roof, the owner or operator shall:

(A) Visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.

(B) For vessels equipped with mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §§60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that

will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

(C) For vessels equipped with a double-seal system as specified in §§60.112b(a)(1)(ii)(B):

(1) Visually inspect the vessel as specified in paragraph (a)(4) of this section at least every 5 years; or

(2) Visually inspect the vessel as specified in paragraph (a)(2) of this section.

(D) Visually inspect the internal floating roof, the primary seal, the secondary, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section.

(E) Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.

(3) **Reporting and Recordkeeping Requirements.**

The owner or operator of the storage vessel shall keep records and furnish reports as follows: The owner or operator shall keep copies of all reports and records required by this section for at least 2 years.

(i) Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §§60.112b(a)(1) and §§60.113b(a)(1). This report shall be an attachment to the notification required by §§60.7(a)(3).

(ii) Keep a record of each inspection performed as required by §§60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

(iii) If any of the conditions described in §§60.113b(a)(2) are detected during the annual visual inspection required by §§60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

(iv) After each inspection required by §§60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §§60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §§61.112b(a)(1) or §§60.113b(a)(3) and list each repair made.

(4) **Monitoring of operations**.

(i) The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (ii) of this section, for at least 2 years. The record required by paragraph (ii) of this section will be kept for the life of the source.

(ii) The owner or operator of the storage vessel as specified in §§60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

(iii) The owner or operator of the storage vessel with a design capacity greater than or equal to 151 m3 storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

(D) Vertical internal floating roof storage tank, identified as Tank No. 5106

with a storage capacity of 5,250,000 gallons will not be subject to NSPS, Subpart Kb, since after it will be constructed it will be storing diesel with a vapor pressure of 0.008 psi. However, when this tank will store VOL or petroleum products with true vapor pressure equal to or greater than 5.2 kPa (0.75 psi) but less than 76.6 kPa (11.3 psi) will be subject to the same requirements of Subpart Kb as the Tank 5104.

(b) 326 IAC 12 and 40 CFR Part 60.500, Subpart XX - Bulk Gasoline Terminals New Source Performance Standard - The source is not subject to the Bulk Gasoline Terminals New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX), because this rule only applies to loading racks which deliver liquid products into gasoline tank trucks.

(c) 326 IAC 12 and 40 CFR 63.420 (Subpart R) - National Emissions Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)The source is not subject to the National Emissions Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) 40 CFR 63.420 (Subpart R) because the owner or operator has documented and recorded that the facility is not a major source.

State Rule Applicability - Entire Source

(a) 326 IAC 2-6 (Emission Reporting)
This source is located in Hendricks County and the potential to emit VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

(b) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity) monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

(a) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of this source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

(b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
This bulk petroleum product storage terminal is not subject to the provision of 326 IAC 8-1-6. This rule applies to facilities located in any county constructed after January 1, 1980, which are not otherwise regulated by any other provisions of 326 IAC 8, and have potential emissions of 25 tons/yr or greater. This bulk petroleum product storage terminal was constructed prior to January 1, 1980, and the modifications made to tanks 5101, 5102, 5103, 5104, 5105, 5161, and 5162 are not subject this rule, since these tanks were not constructed on or after January 1, 1980.

The new Tank 5106 is not subject to 326 IAC 8-1-6 either, as it emits VOC a lot less than 25 tons per year.

(c) 326 IAC 8-4-1 (Applicability: Petroleum Sources)
All sections of rule 326 IAC 8-4 apply to petroleum sources located in Hendricks county.

(d) 326 IAC 8-4-2 (Petroleum Refineries)
The source is not subject to the requirements of 326 IAC 8-4-2 (Petroleum Refineries), because this source is not a Petroleum Refinery.

(e) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)
Petroleum liquid storage tanks (ID Nos. 5101, 5103, 5104, 5105,, 5161 and 5162), each with a capacity greater than 39,000 gallons containing volatile organic liquid whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). Storage tank ID No. 5102 and 5106, store petroleum liquid whose true vapor pressure is less than 1.52 psi and therefore, not subject to the rule.

(1) The internal floating roof from Tanks 5101, 5103, 5104, 5105, 5106, 5161 and 5162 shall be equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.

(2) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(3) All openings, except stub drains, are equipped with covers, lids, or seals such that:

(A) the cover, lid, or seal is in the closed position at all times except when in actual use;
(B) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
(C) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Additionally, pursuant to 326 IAC 8-4-3, the Permittee shall maintain records including the following:

(1) The types of volatile petroleum liquids stored.

(2) The maximum true vapor pressure.

(3) Records of the inspections.

(f) 326 IAC 8-4-4 (Bulk Gasoline Terminal)
The source is not a bulk gasoline terminal, because it does not deliver the gasoline to bulk gasoline plants or to commercial or retail accounts, although it receives gasoline primarily by pipeline. Therefore, it is not subject to this rule.

(g) 326 IAC 8-4-5 (Bulk Gasoline Plants)
The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants) as it is not a bulk gasoline plant which receives gasoline from bulk terminals by transport, and dispenses it via account trucks to local farms, businesses and service stations.

(h) 326 IAC 8-4-6 (Gasoline Dispensing Facilities)
Section 6 of 326 IAC 8-4 applies to any gasoline storage tank installed after July 1, 1989, at a gasoline dispensing facility. The source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), because the source does not dispense gasoline into motor vehicle fuel tanks or portable containers and is not a gasoline dispensing facility.

(i) 326 IAC 8-4-7 (Gasoline Transports)
This source is not subject to the requirements of 326 IAC 8-4-7 (Gasoline Transports),

because the source has no gasoline transport or loading rack. All products are transported through pipelines.

(j) 326 IAC 8-4-8 (Leaks from Petroleum Refineries; Monitoring; Reports)
The source is not subject to the requirements of 326 IAC 8-4-8 (Leaks from petroleum refineries; monitoring; reports), because this source is not a Petroleum Refinery.

(k) 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems)
Pursuant to 326 IAC 8-4-9, sources subject to the requirements of 326 IAC 8-4-4 through 326 IAC 8-4-6 are also subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems). Since the source is not subject to these rules, the requirements of this rule do not apply.

(l) 326 IAC 8-6 (Organic Solvent Emission Limitations)
Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source commenced operation prior to October 7, 1974, therefore, this rule does not apply.

(m) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)
The source is not subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties), because this source is not located in one of the listed counties.

(n) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
The source is not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is not located in one of the listed counties and was constructed prior to January 1, 1980.

(o) There are no other 326 IAC 8 rules that apply to this source.

Conclusion

The operation of this bulk petroleum product storage terminal shall be subject to the conditions of the attached **Registration 063-18408-00035.**

Appendix A: Emission Calculations

Company Name: TEPPCO Indianapolis Terminal
Address City IN Zip: 10731 East County Road 300 North, Indianapolis, IN 46234
Operating Permit No.: 063-18408-00035
Reviewer: Aida De Guzman
Date: January 20, 2004

Total Potential To Emit (tons/year)

	Emissions Generating Activity		
Pollutant	Storage Tanks	Process Fugitive Emissions	**TOTAL**
PM	0.00	0.00	0.00
PM10	0.00	0.00	0.00
SO2	0.00	0.00	0.00
NOx	0.00	0.00	0.00
VOC	14.28	0.17	14.45
CO	0.00	0.00	0.00
total HAPs	1.72	0.029	1.75
worst case single HAP	(Toluene) 0.66	(Toluene) 0.011	(Benzene) 0.173

Total emissions based on rated capacities at 8,760 hours/year.

Controlled Potential To Emit (tons/year)

	Emissions Generating Activity		
Pollutant	Storage Tanks	Process Fugitive Emissions	**TOTAL**
PM	0.00	0.00	0.00
PM10	0.00	0.00	0.00
SO2	0.00	0.00	0.00
NOx	0.00	0.00	0.00
VOC	14.28	0.17	14.45
CO	0.00	0.00	0.00
total HAPs	1.72	0.029	1.75
worst case single HAP	(Toluene) 0.66	(Toluene) 0.011	(benzene) 0.173

Total emissions based on rated capacities at 8,760 hours/year.

Appendix A: Emission Calculations
Tank VOC Emissions - Maximum PTE

Company Name: TEPPCO Indianapolis Terminal
Address City IN Zip: 10731 East County Road 300 North, Indianapolis, IN 46234
Operating Permit No.: 063-18408-00035
Reviewer: Aida De Guzman
Date: January 20, 2004

Tank Number	Product Stored	Losses (Tons per Year)						Total VOC
		Working	Breathing	Withdrawal	Rim Seal	Deck Fitting	Deck Seam	Tons/yr
5101	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.21	0.26	0.43	0.00	0.90
5102	Jet A, Diesel and similar low VP	1.25	0.21	--	--	--	--	1.46
5103	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.21	0.26	0.43	0.00	0.90
5104	Jet A, Diesel and similar low VP	--	--	0.21	0.29	3.34	0.00	3.84
5105	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.21	0.26	0.43	0.00	0.90
5161	Transmix, Gasln, Jet A, Diesel and low VP	--	--	0.01	0.23	0.24	0.00	0.48
5162	Transmix, Gasln, Jet A, Diesel and low VP	--	--	0.01	0.23	0.24	0.00	0.48
5106	Transmix, Gasln, Jet A, Diesel and low VP	--	--	0.28	0.39	4.48	0.00	5.15
Fugitives		--	--	--	--	--	--	0.17
Total VOC		**1.25**	**0.21**	**1.14**	**1.92**	**9.59**	**0.00**	**14.27**

Notes:
All storage tank emissions estimated using USEPA's Tanks 4.09b software program and are based on the estimated maximum annual throughput for each tank.
All annual tank throughputs based on 73 turnovers (once every 5 days) except tanks 5161 & 5162 = 24.

Appendix A: Emission Calculations
Tank HAP Emissions - Maximum PTE

Company Name: TEPPCO Indianapolis Terminal
Address City IN Zip: 10731 East County Road 300 North, Indianapolis, IN 46234
Operating Permit No.: 063-18408-00035
Reviewer: Aida De Guzman
Date: January 20, 2004

Standing Losses

Tank Number	Product Stored	VOC Emissions Tons/yr	Vapor Weight Percent						Total
			Benzene	Toluene	Ethyl-Benzene	Xylenes	Hexane	MTBE	
	Gasoline (worst)	N/A	0.75%	2.00%	0.35%	1.74%	0.53%	1.30%	
	Jet A/Diesel (worst)	N/A	1.51%	6.73%	2.06%	4.19%	1.51%	0.00%	
	Transmix (worst)	N/A	1.51%	6.73%	2.06%	4.19%	1.51%	1.30%	
			HAP Emissions (tons/yr)						
5101	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.90	0.01	0.06	0.02	0.04	0.01	0.01	0.16
5102	Jet A, Diesel and similar low VP	1.46	0.02	0.10	0.03	0.06	0.02	0.00	0.23
5103	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.90	0.01	0.06	0.02	0.04	0.01	0.01	0.16
5104	Jet A, Diesel and similar low VP	3.84	0.06	0.26	0.08	0.16	0.06	0.00	0.61
5105	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.90	0.01	0.06	0.02	0.04	0.01	0.01	0.16
5161	Transmix, Gasln, Jet A, Diesel and low VP	0.48	0.00	0.01	0.00	0.01	0.00	0.01	0.03
5162	Transmix, Gasln, Jet A, Diesel and low VP	0.48	0.00	0.01	0.00	0.01	0.00	0.01	0.03
5106	Transmix, Gasln, Jet A, Diesel and low VP	5.15	0.04	0.10	0.02	0.09	0.03	0.07	0.34
Fugitives		0.17	-	-	-	-	-	-	-
Total		**14.28**	**0.17**	**0.66**	**0.19**	**0.44**	**0.15**	**0.11**	**1.72**

Reference:

All HAP speciation is based on USEPA's Tanks 4.09b software program, which is determined by prorating individual HAP emissions from the total VOC emissions.

Notes:

To determine the worst case emissions for Tank 5102. Jet A service was used since it is slightly higher. However, diesel will bw stored most of the time.

Transmix is a blend of all fuels, but the highest vapor wt%, which is Jet A was used. For MTBE, gasoline service was used as highest HAP.

MTBE is sometimes used to oxygenate fuel, vapor wt% is based on TEPPCO's highest % in the pipelines at the origination point in Texas. No pure MTBE is handled at Indianapolis Terminal.

Diesel is stored in Tank 5106 currently. Gasoline may be stored in the future. To be conservative, the gasoline emissions are listed since it is higher.

Appendix A: Emission Calculations
Process Fugitive Emissions

Company Name: **TEPPCO Indianapolis Terminal**
Address City IN Zip: **10731 East County Road 300 North, Indianapolis, IN 46234**
Operating Permit No.: **063-18408-00035**
Reviewer: **Aida De Guzmam**
Date: **January 20, 2004**

Fugitive VOC emissions

Component Type	Service	Avg. Emission Factor (lb/hr-component)	Quantity*	VOC Emissions (lb/hr)	VOC Emissions (tons/yr)
Flange/Screwed	Light Liquid	1.76E-05	260	0.005	0.02
Connections	Heavy Liquid	Negligible	0	Negligible	Negligible
Valves	Light Liquid	9.48E-05	130	0.012	0.05
	Heavy Liquid	Negligible	0	Negligible	Negligible
Pump Seals	Light Liquid	1.19E-03	16	0.019	0.08
	Heavy Liquid	Negligible	0	Negligible	Negligible
Sample Ports	Light Liquid	2.87E-04	7	0.002	0.01
	Heavy Liquid	Negligible	0	Negligible	Negligible
Total				**0.038**	**0.17**

Note: Emission factors are taken from: U.S. EPA. Office of Air Quality Planning and Standards. Protocol for Equipment Leak Emission Estimates. (Research Triangle Park, NC: U.S. EPA EPA-453/R-95-017, 1995). Table 2-3

Fugitive HAP emissions

Component Type	VOC Emissions Tons/yr	Vapor Weight Percent						Total
		Benzene	Toluene	Ethyl-Benzene	Xylenes	Hexane	MTBE	
Transmix, Gasln, Jet A, Diesel and low VP	N/A	0.75%	2.00%	0.35%	1.74%	0.53%	1.30%	
Jet A, Diesel and similar low VP	N/A	1.51%	6.73%	2.06%	4.19%	1.51%	0.00%	
Nat. Gasln, Gasln, Jet A, Diesel and low VP	N/A	1.51%	6.73%	2.06%	4.19%	1.51%	1.30%	
Total Fugitives	0.17	0.003	0.011	0.003	0.007	0.003	0.002	
Total		**0.003**	**0.011**	**0.003**	**0.007**	**0.003**	**0.002**	**0.029**

* All components are conservatively assumed to be in light liquid service.
Worst case vapor weight percent is used to calculate emissions for each HAP.